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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 16-00227 SI
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
)	[DATE] TO [DATE] AND [PROPOSED] ORDER
v.)	
)	
BTC-E, A/K/A CANTON BUSINESS)	
CORPORATION,)	
)	
and)	
)	
ALEXANDER VINNIK,)	
)	
Defendants.)	
)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Alexander Vinnik that time be excluded under the Speedy Trial Act from through December 16, 2022.

At the initial appearance before the Court held on September 27, 2022, the government and

counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing discovery. For this reason and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until December 16, 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from September 27, 2022, through December 16, 2022, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: September 27, 2022

/s/
 CLAUDIA QUIROZ
 Assistant United States Attorney
 C. ALDEN PELKER
 Trial Attorney, CCIPS

DATED: September 27, 2022

/s/
 DAVID RIZK
 Counsel for Defendant Alexander Vinnik

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on September 27, 2022, and for good cause shown, the Court finds that failing to exclude the time from September 27, 2022, through December 16, 2022, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from September 27, 2022, through December 16, 2022, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from September 27, 2022,

1 through December 16, 2022, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.
2 § 3161(h)(7)(A), (B)(iv).

3 IT IS SO ORDERED.

4
5 DATED: _____

6 HON. SUSAN ILLSTON
United States District Judge